

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Blockquarry Corp. f/k/a ISW Holdings Inc.,)	Civil Action No. 7:23-cv-01427-TMC
)	
Plaintiff,)	
)	
v.)	
)	
Litchain Corp. and Gaffney Board of Public)	DEFENDANT GAFFNEY BOARD OF
Works,)	PUBLIC WORKS ANSWERS TO
)	LOCAL CIV. RULE 26.01 (D.S.C.)
)	INTERROGATORIES
Defendants.)	
)	

Defendant Gaffney Board of Public Works (“Gaffney BPW”), by and through its undersigned counsel, hereby submits these Answers to Interrogatories per Local Civ. Rule 26.01 (D.S.C.).

ANSWERS

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: Unknown.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Blockquarry Corp. f/k/a ISW Holdings Inc. (“Blockquarry”) and Gaffney BPW have requested a jury trial on all issues so triable. Upon information and belief, the following causes of action asserted by and/or against Gaffney BPW are not triable by jury because they are equitable in nature and/or involve pure questions of law: Blockquarry’s request for declaratory judgment relative to the deposit, the personal property on the premises, and alleged indebtedness to Litchain Corp. (“Litchain”) and Gaffney BPW; Blockquarry’s request for injunctive relief; Gaffney BPW’s claims for interpleader and in the nature of interpleader relating to the utility deposit; Gaffney BPW’s claim for interpleader of the cryptocurrency mining equipment; Gaffney BPW’s request for declaratory judgment relating to the return of the utility deposit and cryptocurrency mining equipment; and Gaffney BPW’s request for declaratory judgment relating to the invalidity of the Nondisclosure and Non-Circumvention Agreement. By asserting these claims are not triable by a jury for the purpose of responding to this interrogatory request, Gaffney BPW does not waive its right to a jury trial on these issues should the Court later determine such a right exists and/or circumstances change such that a jury trial is appropriate.

Blockquarry has not asserted any claims against Gaffney BPW to which there is a right to trial by jury.

Gaffney BPW's breach of contract claim against Litchain should be tried by jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Gaffney BPW is not a publicly owned company. See *infra* Answer (H).

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

ANSWER: Blockquarry filed the initiating lawsuit in the District Court of the United States for the District of South Carolina, Spartanburg Division. Further, the action concerns business dealings and personal property located in Gaffney, Cherokee County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and a full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if hear by different judges.

ANSWER: No.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Gaffney BPW makes no such contention.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this manner, identify such person or entity and describe the basis of their liability.

ANSWER: Gaffney BPW makes no such contention at this time. However, discovery in this matter is ongoing. Gaffney BPW reserves the right to amend its response to this request at a later date if it discovers information that changes its response to this interrogatory.

(H) Parties or Intervenor in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332 (a).

ANSWER: Gaffney BPW, is a commission of public works under South Carolina law, particularly Title 5, Chapter 31, Article 3 of the Code of Laws of South Carolina 1976, as amended, and an agent of the City of Gaffney, South Carolina. As such, is a citizen of Gaffney, Cherokee County, South Carolina.

Respectfully submitted,

POPE FLYNN, LLC

May 1, 2023

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